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Palo Verde Solar II, LLC, Blythe Solar Power Project  
Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,  
Blythe Solar Power Project Unit 3, LLC and  
Blythe Solar Power Project Unit 4, LLC*

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MMR GROUP, INC.,  
MMR POWER SOLUTIONS, LLC and  
SOUTHWESTERN POWER GROUP II, LLC,

Plaintiffs,

vs.

STA DEVELOPMENT, LLC (F/K/A SOLAR  
MILLENNIUM, LLC), SOLAR TRUST OF  
AMERICA, LLC, SOLAR MILLENNIUM AG,  
SOLAR MILLENNIUM, INC., CA I-10  
SOLAR, LLC, PALO VERDE SOLAR I, LLC,  
PALO VERDE SOLAR II, LLC, BLYTHE  
SOLAR POWER PROJECT UNIT 1, LLC,  
BLYTHE SOLAR POWER PROJECT UNIT 2,  
LLC, BLYTHE SOLAR POWER PROJECT  
UNIT 3, LLC AND BLYTHE SOLAR POWER  
PROJECT UNIT 4, LLC

Defendants.

Case No. 3:11-cv-01521-EMC

**SIXTH STIPULATION TO EXTEND  
DEFENDANTS' TIME TO RESPOND  
TO AMENDED COMPLAINT AND  
[PROPOSED] ORDER**

**The Honorable Judge  
Edward M. Chen**

## **STIPULATION**

Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and  
SOUTHWESTERN POWER GROUP II, LLC (collectively, “MMR”) and Defendants STA  
DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,  
CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,  
BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT  
UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR  
POWER PROJECT UNIT 4, LLC (collectively, the “STAD Defendants”) respectfully request  
that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,  
filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,  
by 14 days from December 27, 2011 to January 10, 2012.

On November 4<sup>th</sup> and 14<sup>th</sup>, the parties requested, and this Court later granted, a one-week extension of time for the STAD Defendants to respond to the Amended Complaint because the parties were in advanced stages of settlement discussions. On November 22<sup>nd</sup> and December 1<sup>st</sup>, the parties requested, and this Court later granted, extensions of two weeks due to continued progress in settlement negotiations. And on December 19, the parties requested and this Court later granted an extension of one week. The timing of finalizing a settlement has been impacted by several complex factors, but the parties continue to be hopeful that they will execute a settlement agreement forthwith. Due to the upcoming holidays and the continued progress in reaching a settlement, the parties request a 14 day extension of the time for the STAD Defendants to respond to the Amended Complaint. The parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial economy, the parties therefore request that Court extend the STAD Defendants' time to respond to the Amended Complaint by 14 days from December 27, 2011 to January 10, 2012.

1 Dated: December 27, 2011

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**MILBANK, TWEED, HADLEY & McCLOY LLP**

By: /s/ Aaron Renenger

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Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,  
Blythe Solar Power Project Unit 3, LLC and  
Blythe Solar Power Project Unit 4, LLC

Dated: December 27, 2011

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By: /s/ Nicholas A. Merrell

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Solutions, LLC and Southwestern Power Group II, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_ UNITED STATES DISTRICT COURT JUDGE